



ANTHONY D. CORTESE, Sc. D.
Commissioner

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The Commonwealth of Massachusetts
Executive Office of Environmental Affairs
Department of Environmental Quality Engineering
One Winter Street, Boston 02108

May 22, 1984

Merrill Hohman, Director
Waste Management Division
U.S. Environmental Protection Agency
John F. Kennedy Federal Building
Boston, Massachusetts 02203

Dear Mr. Hohman:

The Department is providing comments on the report entitled, "Draft Remedial Action Technologies" for the New Bedford Harbor Superfund site, as prepared by your contractor, NUS Corporation. The report presented an interesting and broad array of all the technologies available to possibly address the contamination problem in New Bedford. The brief descriptions of each of the technologies, however, are of minimal value in the evaluation of feasible technologies for the site.

Studies have been completed (e.g., the DEQE funded study by Malcolm-Pirnie) that examined in depth feasible technologies to remediate the major contamination on this site. Subsequent studies, such as this draft report, should build upon the data, research, and information compiled and elucidated in the earlier studies. Such a process would shorten the time frame for initiating remedial activities on this site.

Secondly, the No Action alternative has been selected in this draft report as one of the remedial options that warrants further consideration. The amount of detail given in the report for this option is insufficient to support any decision on its feasibility. It is most important to thoroughly identify, analyze, and assess the health and environmental risks associated with this option. The socioeconomic consequences, by themselves, as briefly provided, are not sufficient.

Finally, the report places heavy emphasis on land disposal as the ultimate remedial option for the contaminated dredge material, and readily dismisses innovative and untested options. The Department urges the U.S. Environmental Protection Agency to examine innovative technologies that offer promise of a permanent solution towards the cleanup of the Harbor. Traditional, well tested, methods may be preferred for their predictability, but they may not be the best methods to address a unique hazardous waste contamination problem such as New Bedford Harbor. This problem may require unorthodox approaches towards its remedial solution.

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A properly designed pilot test run of promising but yet untested remedial action alternatives may offer valuable information towards devising a permanent solution for this site. Land disposal of chemical waste offers a traditional and long-term solution, but not a permanent solution.

The Department requests that the U.S. EPA consider and incorporate the above comments in the upcoming feasibility study for this site. We look forward to the continued coordination of the remedial response to the PCB hot spot areas in this site. If you have any questions or comments, please contact Ms. Yee Cho (292-5591) of the Division of Hazardous Waste.

Very truly yours,



Thomas F. McLoughlin
Deputy Commissioner

TFM/YC:sa

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